

CV-16-BE-0

2016 May-13 PM 03:39
U.S. DISTRICT COURT
N.D. OF ALABAMACUM
TOD
5/10In the United States District Court
For the Northern District of Alabama

2016 MAY 12 A 10:52

U.S. DISTRICT COURT
N.D. OF ALABAMAJames Broadhead #224802
(Enter above the full name(s)
of the plaintiff(s) in this action)

v.

Correctional, RN, Tarsha Scott,
 Correctional, Ambrely Click,
 Correctional, MHP, Women,
 Correctional, MHP, D. Austin,
 Correctional, Stevenson,
 Correctional, Wilson,
 Correctional, St. Phared,
 Correctional, MHP, Washington,
 Correctional, Robert Hunter,
 Correctional, Thomas,
 Correctional, Pickens,
 Correctional, Smith,
 Correctional, Larry Wista,
 Correctional, Bonner,
 Officer, FLEETON,
 Officer, Robinson,
 Officer, GIBBONS,
 Officer, Grasdon,
 Officer, SUTTON
 (Enter above full name(s) of the
 defendant(s) in this action)

Officer, Hill,
 Officer, LTTS,
 Officer, Felton,
 Officer, C. Smith,
 Officer, Johnson,
 Correctional, Captain, J. Baldwin,
 Officer, Haygood,
 Officer, P. Guardins,
 Officer, L. Cook,
 Officer, Thrasher,
 Officer, Murphyee,
 Officer, CAUTON,
 Officer, STEED,
 Officer, Godsey,
 Correctional, Rambo,
 Officer, Brown,
 Officer, Dross,
 Officer, Tim Pope,
 Officer, AARON.
 (Enter above full name(s) of the
 defendant(s) in this action)

1. Previous lawsuits

A. Have you begun other lawsuits in state or federal court(s) dealing with the same facts involved in this action or otherwise relating to your imprisonment?
 Yes() No()

B. If your answer to A, is "yes", describe each lawsuit in the space below, (If there is more than one lawsuit, describe the additional lawsuit(s) on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiff(s): _____

Defendant(s): _____

2. Court (if Federal Court, name the district; if State Court, name the county)

3. Docket number _____

4. Name of Judge to whom case was assigned _____

5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit _____ N/A

7. Approximate date of disposition _____

II. Place of present confinement William E. Donaldson Correctional Facility

A. Is there a prisoner grievance procedure in this institution?

Yes No

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes No

C. If your answer is YES:

1. what steps did you take? KM, Scott and CPN, Clark and women
Correctional Officers

2. What was the result? and Austin, and CPN, Stevenson and Wilson,
and St. Phord and Washington and Hunter and Thomas and Pickens and
Smith and Lanny Winters and Bonner, and FLEETON and Robinson and Gibbons

D. If your answer is NO, explain why not? and Gasdon and SUTTON and
Hill and LTIES and Felton and C. Smith and Johnson and J. Baldwin and
Haygood and P. Gradyins and L. Cook and Thawson, and Mukphree, and

CAUETON and STEED, and GoddesY and Rambo, and Brown and Dross and Tim Pope and
AAKON

III. Parties

In Item A below, place your name(s) in the first blank and place your present address in the second blank, do the same for additional plaintiffs, if any.

A. Name of plaintiff(s) James Broadhead #224802,
Bullock Correctional Facility, P.O. Box 5107,
Union Springs AL, 36089,

IV. EXHAUSTION OF LEGAL REMEDIES.

- (16, There is no! Inmate Grievance procedure in the Alabama Department of Corrections AR # 319, Inmate Grievance procedure is not available to inmates Because it is still on review,
- (17, Plaintiff, re-allege and incorporate by reference to paragraphs 1-16.
- (18, The unlawful Deadly Physical Force on - plaintiff constitute Assault and Battery. Violated plaintiff, James Broadhead Rights and constituted A Criminal Offense in Alabama under the Statutes Code 1896 § 44, Sections § ~~13A-1-2(8)~~-13A-3-23, section ~~13A-1-2(8)~~ § 13A-1-2(9). of the Criminal Code of 1975,
- (19, The broken Elbow and burst head and teeth broken of plaintiff, Violated plaintiff James Rights under the Statutes Sections § 13A-3-23, 13A-1-2(8) 13A-1-2(9) of the Criminal Code of 1975, and constituted Due process Violation unde Color of state law, under the Section § 8, 10, 11, 13, 15, of Art I of the constitution of Alabama of 1901, 20) The plaintiff has no plain adequate or complete remedy at law to redress the wrongs described here in Plaintiff has been and will continue to be irreparably injured by the court of the defendants unless the court grants the prosecutions and the compensatory and punitive damages relief which plaintiff seeks,

(2),

VI, PRAYER FOR RELIEF

Wherefore plaintiff respectfully prays that this court enter judgment granting plaintiff:

- (21, A declaration that the acts and omissions described herein violated plaintiffs rights under the statutes under the Criminal Offense under the title 13A Criminal Code of 1975, and the constitution and laws of the State of Alabama.
- (22, Compensatory damages in the amount of \$10,000.00 against each defendant jointly and severally.
- (23, Punitive damages in the amount of \$10,000.00 against each defendant.
- (24, A. Jury trial on all issues triable by jury.
- (25, Granting Appointment of Counsel)
- (26, Plaintiff cost in this case
- (27, Circuit Court judges authority granted them by law to exercise such other powers as are or may be granted them by law [312-17-26 code of Alabama 1975].

The Plaintiff not have grievance procedure BUT "STILL made complaint to warden and Commissioner I" was put on transfer for Donaldson so I EXHAUST all available administrative remedies before the filing of Scott, Correctional Click. This is the act of the (Plaintiff) Officer, [REDACTED] and [REDACTED], all (4) is employed as Defendants acted under state law and color of state law with deadly excessive force as the Plaintiff was beat and struck with security sticks by (4) officers named herein as Defendants in said case therefore the Plaintiff was struck,

"Cooper Green Hospital"

986, Times by the (4) named Defendants as the Plaintiff was placed in a free world hospital where he had broken arm in (3) places and staples in the head and (3) or (4) teeth was knocked out as there was threats on the Plaintiff life the Plaintiff was transferred for his safety as the Plaintiff had fracture to his feet and ankle area from deadly excessive force from Defendants." compensatory damages in the amount of \$10,000.00 against each defendant jointly and severally for irreparable injuries..... Punitive damages in the amount of \$10,000.00 against each defendant jointly and severally for irreparable injuries..... for a total sum of \$80,000.00 thousand dollars total claim Plaintiff cost in lawsuit,

BACK →

Segregation H9-bt
x James Broadhead
Bullock Correctional
Facility P.O. Box 5107, Union Springs AL
AIS# 224802, 36089